

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

VIRGINIA INNOVATION SCIENCES, INC.,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Civil Action No. 4:18-cv-00474-ALM

**DECLARATION OF LARA ROGERS IN SUPPORT OF
MOTION OF DEFENDANT AMAZON.COM, INC. TO
TRANSFER VENUE TO THE EASTERN DISTRICT OF VIRGINIA**

I, Lara Rogers, hereby declare as follows:

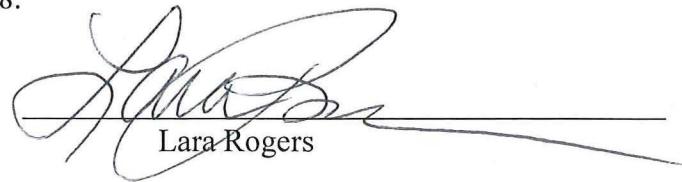
1. I am Senior Corporate Counsel for Amazon.com, Inc. (“Amazon”) and have worked as in-house counsel for Amazon since October 2013. I have personal knowledge of the facts set forth in this Declaration, and if called upon to do so, could and would testify competently thereto.

2. To the best of my knowledge, the Amazon employees knowledgeable about the design, development, and technical operation of the Alexa voice service, Dash Replenishment Service, Echo, Fire TV, Dash Button, and Fire tablet products are located at Amazon’s offices in Seattle, Washington; Cambridge, Massachusetts; the San Francisco Bay Area; and Amazon’s overseas offices in the United Kingdom, Germany, and India. Generally, technical documents related to these products and services are generated by these employees and stored by them from the offices in which they work. Source code for these products and services is generated by these engineers and stored on servers managed by the Source Team, a subpart of the Builder Tools team. The members of this team are based in Seattle, Washington.

3. No employees knowledgeable about the design, development, or technical operation of the Alexa voice service, Dash Replenishment Service, or Amazon Echo, Fire TV, Dash Button, or Fire tablet products are based in the Eastern District of Texas. No employees with knowledge of financial or marketing information relating to the Alexa voice service, Dash Replenishment Service, or Amazon Echo, Fire TV, Dash Button, or Fire tablet products are based in the Eastern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of September, 2018.



A handwritten signature in black ink, appearing to read "Lara Rogers", is written over a horizontal line. The signature is fluid and cursive, with a long, sweeping line extending to the right.